

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

JANE DOE,

Plaintiff,

v.

ABDELKADER AMAL, *et. al.*,

Defendants.

CASE NO. 1:12-cv-1359 (AJT/TCB)

ANSWER AND GROUNDS OF DEFENSE

Abdelkader Amal, Hnia Amal, and Lama Property Maintenance, LLC (collectively "Defendants"), by counsel, in response to the Complaint filed by Jane Doe state as follows:

1. The allegations contained in the Preliminary Statement are denied and the Defendants demand strict proof of those allegations contained in the first paragraph of the Complaint.
2. The Defendants are not contesting subject matter jurisdiction.
3. The Defendants are not contesting venue.
4. Due to the fact that the Plaintiff is named as "Jane Doe," the allegations contained in Paragraph 4 can neither be admitted nor denied and are therefore taken as denied.
5. Paragraph 5 of the Complaint is admitted.
6. Paragraph 6 of the Complaint is admitted.
7. Paragraph 7 of the Complaint is admitted.
8. Paragraph 8 of the Complaint is admitted.
9. Due to the fact that the Plaintiff is named as "Jane Doe," the allegations contained in Paragraph 9 can neither be admitted nor denied and are therefore taken as denied.

10. It is admitted that while the Defendants lived in Morocco they employed individuals to cook and clean their residence. The remaining allegations contained in Paragraph 10 of the Complaint can neither be admitted nor denied because the Plaintiff's identity is not revealed in the Complaint.

11. The allegations contained in Paragraph 11 are denied in that no such offer of employment was made to anyone.

12. The allegations contained in Paragraph 12 are denied in that no such representations were made to anyone.

13. The allegations contained in paragraph 13 of the Complaint are denied.

14. The allegations contained in paragraph 14 of the Complaint are denied.

15. The allegations contained in paragraph 15 of the Complaint are denied.

16. The Defendants were not party to the conversation which purportedly happened in Paragraph 16 and therefore can neither admit nor deny the allegations contained therein. The allegations contained in Paragraph 16 of the Complaint are therefore denied.

17. The allegations contained in Paragraph 17 of the Complaint are denied.

18. The allegations contained in Paragraph 18 of the Complaint are denied.

19. Due to the fact that the Plaintiff is named as "Jane Doe," the allegations contained in Paragraph 19 can neither be admitted nor denied and are therefore taken as denied.

20. Due to the fact that the Plaintiff is named as "Jane Doe," the allegations contained in Paragraph 20 can neither be admitted nor denied and are therefore taken as denied.

21. Due to the fact that the Plaintiff is named as "Jane Doe," the allegations contained in Paragraph 9 can neither be admitted nor denied and are therefore taken as denied.

22. The allegations contained in Paragraph 22 of the Complaint are denied.

23. The allegations contained in Paragraph 23 of the Complaint are denied.

24. The allegations contained in Paragraph 24 of the Complaint are denied.

25. The allegations contained in Paragraph 25 of the Complaint are denied.

26. The allegations contained in Paragraph 26 of the Complaint are denied.

27. The allegations contained in Paragraph 27 of the Complaint are denied.

28. The allegations contained in Paragraph 28 of the Complaint are denied.

29. The allegations contained in Paragraph 29 of the Complaint are denied because there was no promised wages.

30. The allegations contained in Paragraph 30 of the Complaint are denied because there was no promised wages.

31. The allegations contained in Paragraph 31 of the Complaint are denied because there was no promised wages.

32. The allegations contained in Paragraph 32 of the Complaint are denied.

33. The allegations contained in Paragraph 33 of the Complaint are denied.

34. The allegations contained in Paragraph 34 of the Complaint are denied.

35. The allegations contained in Paragraph 35 of the Complaint are denied.

36. The allegations contained in Paragraph 36 of the Complaint are denied.

37. The allegations contained in Paragraph 37 of the Complaint are denied.

38. The allegations contained in Paragraph 38 of the Complaint are denied.

39. The allegations contained in Paragraph 39 of the Complaint are denied.

40. The allegations contained in Paragraph 40 of the Complaint are denied.

41. The allegations contained in Paragraph 41 of the Complaint are denied.

42. The allegations contained in Paragraph 42 of the Complaint are denied.

43. The allegations contained in Paragraph 43 of the Complaint are denied.

44. The allegations contained in Paragraph 44 of the Complaint are denied.

45. The allegations contained in Paragraph 45 of the Complaint are denied.

46. The allegations contained in Paragraph 46 of the Complaint are denied.

47. The allegations contained in Paragraph 47 of the Complaint are denied.

48. The allegations contained in Paragraph 48 of the Complaint are denied.

49. The allegations contained in Paragraph 49 of the Complaint are denied.

50. The allegations contained in Paragraph 50 of the Complaint are denied.

51. The allegations contained in Paragraph 51 of the Complaint are denied.

52. The allegations contained in Paragraph 52 of the Complaint are denied.

53. The allegations contained in Paragraph 53 of the Complaint are denied.

54. The allegations contained in Paragraph 54 of the Complaint are denied.

55. The Defendants were not party to the conversation which purportedly happened in Paragraph 55 and therefore can neither admit nor deny the allegations contained therein. The allegations contained in Paragraph 55 of the Complaint are therefore denied.

56. The allegations contained in Paragraph 56 of the Complaint are denied.

57. The Defendants were not party to the conversation which purportedly happened in Paragraph 57 and therefore can neither admit nor deny the allegations contained therein. The allegations contained in Paragraph 57 of the Complaint are therefore denied.

58. The allegations contained in Paragraph 58 of the Complaint are denied.

59. The allegations contained in Paragraph 59 of the Complaint are denied.

60. The allegations contained in Paragraph 60 of the Complaint are denied.

61. Paragraph 61 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 61 of the Complaint are denied.

62. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 61.

63. Paragraph 63 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 63 of the Complaint are denied.

64. The allegations contained in Paragraph 64 of the Complaint are denied.

65. The allegations contained in Paragraph 65 of the Complaint are denied.

66. The allegations contained in paragraph 66 of the Complaint call for a legal conclusion to which no response is required. To the extent that any response is required, the allegations contained in Paragraph 66 of the Complaint are denied.

67. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 66.

68. Paragraph 68 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 68 of the Complaint are denied.

69. The allegations contained in paragraph 69 of the Complaint are denied.

70. The allegations contained in paragraph 70 of the Complaint are denied.

71. The allegations contained in paragraph 71 of the Complaint are denied.

72. The allegations contained in paragraph 72 of the Complaint are denied.

73. Paragraph 73 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 73 of the Complaint are denied.

74. The allegations contained in Paragraph 74 of the Complaint are denied.

75. The allegations contained in Paragraph 75 of the Complaint are denied

76. Paragraph 76 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 76 of the Complaint are denied.

77. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 76.

78. Paragraph 78 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 78 of the Complaint are denied.

79. The allegations contained in Paragraph 79 of the Complaint are denied.

80. Paragraph 80 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 80 of the Complaint are denied.

81. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 80.

82. The allegations contained in Paragraph 82 of the Complaint are denied.

83. The allegations contained in Paragraph 83 of the Complaint are denied.

84. The allegations contained in Paragraph 84 of the Complaint are denied.

85. The allegations contained in Paragraph 85 of the Complaint are denied.

86. Paragraph 86 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 86 of the Complaint are denied.

87. The allegations contained in Paragraph 87 of the Complaint are denied.

88. Paragraph 88 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 88 of the Complaint are denied.

89. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 88.

90. Paragraph 90 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 90 of the Complaint are denied.

91. The allegations contained in Paragraph 91 of the Complaint are denied.

92. Paragraph 92 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 92 of the Complaint are denied.

93. Paragraph 93 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 93 of the Complaint are denied.

94. Paragraph 94 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 94 of the Complaint are denied.

95. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 95.

96. The allegations contained in Paragraph 96 of the Complaint are denied.

97. The allegations contained in Paragraph 97 of the Complaint are denied.

98. The allegations contained in Paragraph 98 of the Complaint are denied.

99. The allegations contained in Paragraph 99 of the Complaint are denied.

100. Paragraph 100 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 100 of the Complaint are denied.

101. The allegations contained in Paragraph 101 of the Complaint are denied.

102. Paragraph 102 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 102 of the Complaint are denied.

103. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 102.

104. The allegations contained in Paragraph 104 of the Complaint are denied.

105. The allegations contained in Paragraph 105 of the Complaint are denied.

106. The allegations contained in Paragraph 106 of the Complaint are denied.

107. Paragraph 107 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 107 of the Complaint are denied.

108. The allegations contained in Paragraph 108 of the Complaint are denied.

109. Paragraph 109 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 109 of the Complaint are denied.

110. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 109.

111. The allegations contained in Paragraph 111 of the Complaint are denied.

112. The allegations contained in Paragraph 112 of the Complaint are denied.

113. The allegations contained in Paragraph 113 of the Complaint are denied.

114. The allegations contained in Paragraph 114 of the Complaint are denied.

115. The allegations contained in Paragraph 115 of the Complaint are denied.

116. The allegations contained in Paragraph 116 of the Complaint are denied.

117. The allegations contained in Paragraph 117 of the Complaint are denied.

118. The allegations contained in Paragraph 118 of the Complaint are denied.

119. The allegations contained in Paragraph 119 of the Complaint are denied.

120. The allegations contained in Paragraph 120 of the Complaint are denied.

121. Paragraph 121 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 121 of the Complaint are denied.

122. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 121.

123. Paragraph 123 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 123 of the Complaint are denied.

124. The allegations contained in Paragraph 124 of the Complaint are denied.

125. Paragraph 125 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 125 of the Complaint are denied.

126. Paragraph 126 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 126 of the Complaint are denied.

127. Paragraph 127 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 127 of the Complaint are denied.

128. The allegations contained in Paragraph 128 of the Complaint are denied.

129. Paragraph 129 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 129 of the Complaint are denied.

130. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 129.

131. The allegations contained in Paragraph 131 of the Complaint are denied.

132. The allegations contained in Paragraph 132 of the Complaint are denied.

133. The allegations contained in Paragraph 133 of the Complaint are denied.

134. The allegations contained in Paragraph 134 of the Complaint are denied.

135. The allegations contained in Paragraph 135 of the Complaint are denied.

136. The allegations contained in Paragraph 136 of the Complaint are denied.

137. The allegations contained in Paragraph 137 of the Complaint are denied.

138. Paragraph 138 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 138 of the Complaint are denied.

139. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 138.

140. The allegations contained in Paragraph 140 of the Complaint are denied.

141. The allegations contained in Paragraph 141 of the Complaint are denied.

142. The allegations contained in Paragraph 142 of the Complaint are denied.

143. The allegations contained in Paragraph 143 of the Complaint are denied.

144. The allegations contained in Paragraph 144 of the Complaint are denied.

145. Paragraph 145 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 145 of the Complaint are denied.

146. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 145.

147. The allegations contained in Paragraph 147 of the Complaint are denied.

148. The allegations contained in Paragraph 148 of the Complaint are denied.

149. The allegations contained in Paragraph 149 of the Complaint are denied.

150. The allegations contained in Paragraph 150 of the Complaint are denied.

151. The allegations contained in Paragraph 151 of the Complaint are denied.

152. The allegations contained in Paragraph 152 of the Complaint are denied.

153. Paragraph 153 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 153 of the Complaint are denied.

154. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 153.

155. The allegations contained in Paragraph 155 of the Complaint are denied.

156. The allegations contained in Paragraph 156 of the Complaint are denied.

157. The allegations contained in Paragraph 157 of the Complaint are denied.

158. The allegations contained in Paragraph 158 of the Complaint are denied.

159. The allegations contained in Paragraph 159 of the Complaint are denied.

160. Paragraph 160 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 160 of the Complaint are denied.

161. Defendants incorporate herein by reference their prior responses to paragraphs 1 through 160.

162. Paragraph 162 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 162 of the Complaint are denied.

163. Paragraph 163 of the Complaint calls for a legal conclusion and does not require a response. To the extent that a response is required, the allegations contained in Paragraph 163 of the Complaint are denied.

164. Paragraph 164 of the Complaint does not require a response.

165. Any allegation not expressly admitted herein is denied.

AFFIRMATIVE DEFENSES

1. Failure to state a claim upon which relief can be granted.
2. The Defendants will rely upon the statute of limitations.
3. The Defendants will rely upon good faith and reasonable grounds in defense of the Plaintiff's alleged FLSA claim.
4. Plaintiff's claims are barred in whole or in part by her own breach, acts and/or conduct.
5. The Defendants will rely upon the doctrine of estoppel.
6. The Defendants will rely upon the doctrine of setoff.
7. The Defendants will rely upon the doctrine of waiver.
8. Defendants intend to rely upon any and all other defenses, including affirmative defenses, which become known to them up until and during the trial of this matter.

Respectfully submitted,
ADELKADER AMAL, *et. al.*,
By counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of February 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an electronic notification of such filing to the following:

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